

PART 1 FOREIGN INFLUENCE

Chapter 8: Jay Kim

In July 1997, Representative Jay Kim (R-Ca.) and his wife, June Kim, pled guilty to numerous violations of federal campaign finance laws arising out of his 1992 and 1994 campaigns. The violations were part of a scheme which funneled over \$230,000 in illegal corporate funds, some of which were directed by foreign nationals, into Representative Kim's campaigns -- the largest amount of criminal campaign violations ever committed by a member of Congress.¹ Five corporations pled guilty to making the illegal contributions, and Representative Kim's campaign treasurer, Seokuk Ma, was convicted of soliciting and accepting illegal contributions. Some of these violations occurred well after the Kims became aware that they were targets of a federal investigation. Federal prosecutors have reportedly argued that Representative Kim should receive jail time for conduct that was "substantial, prolonged, deceptive and serious."²

Based on the evidence before the Committee, we make the following findings regarding this matter:

FINDINGS

- (1) The Kims appear to have continued some of the same troubling practices during the 1996 election cycle that laid the foundation for the criminal misconduct in the prior two election cycles, including using a campaign treasurer with no knowledge of federal election law and instructing the treasurer to sign blank checks and blank Federal Election Commission forms.**
- (2) The evidence before the Committee suggests that June Kim's recently-disclosed book deal with a South Korean publishing company may be an attempt to inappropriately channel foreign money to the Kims.**

THE KOREA TRADERS CLUB

In July 1992, the Korean-American community of Los Angeles was reeling from the effects of the riots that had devastated many neighborhoods in the city earlier that year. In many instances, angry mobs of looters had targeted Korean-owned businesses and many of the victims felt that they had not received adequate protection or attention from the city. Against this backdrop, an association of businesspeople called the Korea Traders Club of Los Angeles met on July 16, 1992, to discuss the recently-announced candidacy of Jay Kim, a prominent Southern California businessman and member of the Korean-American community.³ Kim attended the meeting and was the featured speaker.⁴ Although many of the attendees supported his candidacy, the foreign nationals in the group could not legally direct contributions to his campaign and corporate funds could not be used under any circumstances to make direct contributions. Faced with these obstacles, the members of the club devised a scheme to make illegal campaign

contributions “in a manner that would prevent them from being detected by the U.S. Government.”⁵ Following the meeting, club Chairman Byung Joon Lee, who had presided at the meeting, sent a letter to members of the club summarizing and confirming the plan devised at the meeting.⁶ The plan provided for the member companies to make their contributions to the Kim campaign under the names of individual employees who were United States citizens or permanent residents.⁷ These employee “conduits” would then be reimbursed for their contributions.

Five U.S. subsidiaries of corporations headquartered in Seoul, South Korea, eventually pled guilty to making contributions pursuant to this scheme and paid fines totaling \$1.6 million.⁸ In early September 1992, for example, three top managers of the Daewoo Corporation, including the vice-president/general manager, received a total of \$5,000 from the Daewoo Corporation and immediately made campaign contributions in the same amount to the Kim campaign committee.⁹ Collectively, these five corporations and their foreign national employees made over \$27,000 in illegal campaign contributions to Representative Kim’s 1992 election campaign.

KIM’S CONTRIBUTIONS FROM HIS OWN BUSINESS IN 1992

In addition to the \$27,000 in illegal corporate/foreign national contributions, Representative Kim also funneled at least \$83,000 worth of goods and services from his company, Jay Kim Associates, into his campaign from March 1992 through July 1993.¹⁰ According to press reports, these illegal contributions included company payments for numerous mailing, printing, telephone, photocopying, entertainment, and travel costs of the campaign.¹¹ In addition, the campaign reportedly received free office space in the company’s headquarters, and benefitted from the services of several company employees who worked half-time for the campaign while being paid entirely from company funds.¹² Questions were also raised about Representative Kim’s continuing receipt of a full-time salary from the company even after he was elected.¹³

When first confronted with these specific allegations, Representative Kim blamed any improper campaign expenditures on the company’s financial chief, Fred Schultz, who also served briefly as campaign treasurer.¹⁴ “If I’ve done anything wrong, I believe it’s his fault,” Representative Kim said. “It’s his job to make sure I don’t make a mistake.”¹⁵ Four years after this statement, as discussed in more detail later in this chapter, Representative Kim has failed to ensure that his campaign is served by qualified campaign treasurers. This lapse invites serious skepticism about whether his future campaign finances will be conducted in accordance with the law.

THE KIM’S ACCEPTANCE OF CORPORATE FUNDS

Both Representative Kim and his wife, June Kim, have acknowledged that they knowingly accepted illegal corporate contributions during the 1992 campaign and concealed the nature of those contributions in the election reports they filed with the Federal Election Commission (“FEC”).¹⁶ Misreporting was sometimes accomplished simply by omitting a donor’s corporate designation, such as. “inc.” from the names of contributors reported to the FEC.¹⁷ In addition, the Kims pled guilty to knowingly accepting illegal contributions from Korean Air Travel (\$1,000),

Daewoo Electronics (\$5,000), Rocket Electric Company, Inc. (\$1,000), Pusan Pipe America, Inc. (\$3,000), and Samsung America, Inc. (\$10,000).¹⁸

June Kim also accepted a \$12,000 check that she knew to be from a corporate account. Although the writer of the check, David Chang of Nikko Enterprises, had intended to donate \$5,000 to President Bush, \$5,000 to Sen. Alphonse D'Amato (R-NY), and only \$2,000 to Representative Kim, June Kim filled in her own name as the payee and deposited the entire amount into her personal account.¹⁹ Representative Kim began listing the money from Chang as a "personal loan" on his financial disclosure reports in 1994 after FBI agents visited Chang's office.²⁰ However, when David Chang contacted Representative Kim to determine why he had not received a thank-you letter for his contribution, Representative Kim denied receiving any contribution from Chang.²¹ After Representative Kim learned that FBI agents had questioned Chang about the contribution, he encouraged Chang to describe it as a loan.²² The "personal loan" from Chang does not appear on Representative Kim's latest financial disclosure statement.²³ Representative Kim has admitted knowing that this was an illegal corporate contribution.²⁴ The Kims' admissions as to the illegal nature of the corporate contributions made by Pusan, Rocket Electric, and Nikko brought to \$43,000 the total amount of illegal corporate contributions made during the 1992 campaign.

ACCEPTANCE OF FUNDS FROM FOREIGN NATIONALS

Representative Kim also admitted accepting a \$50,000 loan from a Taiwanese national named Song Nien Yeh in May 1992, and depositing the loan proceeds into his personal bank account. Four days later, Kim wrote a \$50,000 personal check from that same account to his campaign committee.²⁵ The next month, following the same pattern, he arranged for a \$30,000 loan from another Taiwanese national. Kim's wife deposited these funds into their personal joint checking account.²⁶ Four days later, June Kim wrote a personal check from that same account for \$25,000 to Kim's campaign committee.²⁷

June Kim also personally laundered two illegal contributions, each in the amount of approximately \$9,000 (in excess of contribution limits) from Jaycee Kim, a businessman and father-in-law of Kim's son.²⁸ From September 15, 1992 and continuing to on or about January 24, 1997, at least one (and sometimes all) of these illegal loans, totaling \$84,000, were misreported by the campaign committee as personal loans from Jay Kim to the campaign.²⁹

To put these amounts of illegal contributions into perspective, Representative Kim received \$346,218 in contributions for his initial 1992 primary race, which he won by 898 votes, or two percent of the total votes cast.³⁰ Of that total, \$146,010 of the contributions were illegal.³¹ These illegal contributions constituted the approximate difference between Representative Kim's fundraising and that of his two closest rivals.³² In recommending that Representative Kim serve time in prison for these violations, the prosecutor argued that "[t]he election results might have been different if defendant Jay Kim had not had the illegal and unfair advantage of these campaign contributions."³³

ALLEGED VIOLATIONS DURING THE FEDERAL INVESTIGATION

Remarkably, the illegal activities of the Kims continued even after they knew they were under investigation for possible election law violations, and after the FBI had seized records from Jay Kim Engineering as part of the inquiry. For example, in October 1993, June Kim has admitted that she knowingly accepted a total of \$14,000 from Amko Advertising Inc. had first been deposited with Samas Telecom, the business owned by Representative Kim's campaign treasurer, and then used by June Kim to reimburse various individuals for making seemingly legal campaign contributions.³⁴ In January 1994, June Kim knowingly accepted illegal corporate contributions totaling \$5,450 from the following seven corporations: Haitai America, Inc. (\$1,000), Bacco, Inc. (\$500), Korean Federation of Los Angeles, Inc. (\$500), Sun Princess Cosmetics, Inc. (\$2,500), Dong-A America Corp. (\$150), Universal Market Supply Corp. (\$600), and Tiger Contract Services, Inc. (\$200).³⁵

THE CONVICTION OF KIM'S FORMER CAMPAIGN TREASURER

In his trial in early 1997, Seokuk Ma, Representative Kim's campaign treasurer during 1994 and 1995, candidly admitted that he had violated several election laws, but claimed that he did not do so knowingly because he had received no training or instruction on how to discharge the responsibilities of a campaign treasurer. Although the culpability of Representative Kim in appointing Ma to the position of campaign treasurer was not addressed during Ma's trial, the record of that proceeding produced ample evidence that Representative Kim adopted an attitude of reckless disregard for the legal problems that political fundraising activities inevitably present.

Ma's trial testimony paints a picture of a moderately successful businessman who emigrated to this country in 1971 and was very active in the affairs of the Korean-American community in Southern California.³⁶ Ma became involved in numerous charitable fundraising activities, but had never participated in political fundraising until a friend asked for his assistance in staging an October fundraiser for Representative Kim's 1992 campaign.³⁷ Ma met Representative Kim for the first time at that fundraiser, which surpassed expectations, and was later asked to serve as a volunteer fundraiser.³⁸ Ma testified that he was unwilling to say no to such a prominent member of the Korean-American community, acceded to Representative Kim's request and assisted in organizing two or three additional fundraising events over the next year.³⁹ During this entire time, Ma had no familiarity with U.S. election laws and turned all proceeds from such fundraisers over to June Kim, whom Ma understood to be "the person in charge of financial matters for the Kim campaign."⁴⁰

In April 1994, as Representative Kim was preparing to make his first run for reelection, his campaign office presented Ma with an FEC document designating him as campaign treasurer and asked him to sign it. As Ma describes it, this was not a momentous occasion for him: "[T]hey bring this one sheet of paper with a blank. They want me to sign, so I sign it."⁴¹ Ma received no special training or instruction of any kind with respect to FEC regulations or federal election law.⁴² Correspondence from the FEC addressed to the campaign treasurer, including guides explaining federal campaign laws, was never forwarded to Ma.⁴³ During this time, June Kim

presented at least two totally blank FEC disclosure forms to Ma for his signature. These FEC disclosure forms were filled in by campaign staff and later filed as the April 15, 1994, and December 2, 1994, reports from the Kim campaign.⁴⁴ When asked why he had signed these forms in blank when his signature constituted a verification that the contents of the document were accurate, Ma explained: “I respecting congressman very much. He’s a very successful man. And also Mrs. Kim is Congressman Kim’s wife. They asking me do something like that, I cannot refuse because I trusted them. Our culture is very different to explain, but . . . if I say no, it’s kind of insult to them . . .”⁴⁵ Ma also explained that, although he technically had authority over Representative Kim’s campaign account, June Kim invariably only presented him with blank checks to sign.⁴⁶ As Ma testified, “always a blank check, 20 stack of blank check they gave to me, want me to sign it, I sign it.”⁴⁷

Ma also testified that he had used \$14,000 from his own business to reimburse individuals whom he had asked to make contributions to Representative Kim.⁴⁸ Based partly on Ma’s testimony, June Kim pled guilty to knowingly accepting these same illegal contributions, as well as illegal contributions from other sources.⁴⁹ Although both individuals sought to evade U.S. election law, the outcomes were not the same. As Ma noted in his deposition, “I tell the truth, that’s what happened. So I got that count also. My case that’s the felony; her case that’s the misdemeanor.”⁵⁰

POSSIBLE ELECTION LAW VIOLATIONS DURING THE 1996 CYCLE

Ma testified during his trial that he violated election laws as recently as 1996 by reimbursing his secretary and her husband for contributions to the Kim campaign.⁵¹ When asked about these revelations of recent election law violations, Ma explained that the pressure for money continued even after he was replaced as the campaign treasurer in 1995. “I heard a lot of times every time campaign fund is not enough, campaign fund is not enough, all the time I hear from both Jay Kim and June Kim. I feel like -- feel guilty, I trying to help them. So I had \$1,000 donation 1996 election, so my limit, my limit is \$1,000, so I trying to help the last time, so I used my secretary name and her husband.”⁵² This account of the unrelenting pressure being placed on Ma to come up with additional contributions is especially damning when one considers that June Kim knowingly accepted at least \$14,000 in illegal contributions from Ma in 1994.

June Kim had removed Ma as campaign treasurer when she learned that he was being investigated by the FBI with respect to election law violations.⁵³ Then, in 1996, with a federal investigation ongoing, both she and her husband continued to pressure this same individual to arrange additional contributions. Ma conceded that June Kim had personally received the checks in question and that she knew Ma’s secretary, but he claimed that June Kim would not know that they would be unlikely to be able to afford such contributions.⁵⁴ Nevertheless, his testimony in this regard is perhaps even more revealing than any attribution of direct knowledge. Ma testified that “[O]h, she knows my secretary, but like she has ability contributing that \$500 or not, June Kim don’t know. Actually, she don’t care.”⁵⁵ Ultimately, the jury rejected Ma’s defense and required him to accept responsibility for his actions in violating federal election laws. Although, as detailed above, the Kims pled guilty to certain misdemeanor violations, it appears to the

Minority that they have yet to accept responsibility for the role they played in fostering an atmosphere in which so many violations could occur.

KIM'S COMMITMENT TO COMPLIANCE WITH U.S. ELECTION LAWS

According to one press report, Representative Kim once characterized U.S. election laws as “stupid” and compared violations to “jaywalking.”⁵⁶ Later, in a brief, written statement released to the press upon the announcement of his guilty plea last August, Representative Kim remarked that “[w]ith many lessons learned, it is time to move forward.”⁵⁷ Based on the depositions of his current campaign staff conducted by the Committee, it appears that few lessons have, in fact, been learned. Most notably, the Committee deposed his current campaign treasurer, Moon Jae Lee. Lee is a grocery store operator and a friend of Seokuk Ma who has served as Representative Kim’s treasurer since approximately February 1995.⁵⁸ When June Kim indicated to Ma that she wished to replace him as campaign treasurer because of the FBI investigation, Ma testified that she asked him, “You have any friends, anybody, maybe can sign, just like [you]?”⁵⁹

June Kim’s search for someone who would “sign just like” Ma appears to have been successful. Moon, who agreed to assume the non-paying title as a favor to both Ma and Kim,⁶⁰ candidly related that his only duties as Representative Kim’s campaign treasurer are to sign batches of blank checks from the campaign account presented to him by either Mrs. Kim or the campaign’s sole staffer at the present time, assistant treasurer Inyoung Brazil.⁶¹ Moon does not receive or review the bank statements for the campaign account and has only visited the campaign office twice during his tenure as campaign treasurer.⁶² All of the campaign’s financial records and finance reports are the responsibility of Brazil, a campaign staffer who works only part-time during non-election years.⁶³ Neither Lee nor Brazil could offer any explanation of why the responsibilities of the campaign treasurer were so narrowly defined.⁶⁴ Lee does not sign FEC disclosure reports for the campaign,⁶⁵ but Ma testified that Lee had told him that June Kim had asked Lee to sign a blank FEC disclosure report.⁶⁶ According to Ma, Lee refused this request.⁶⁷ Lee, for his part, denied that June Kim had ever made this request of him.⁶⁸

Minimal as they are, Lee testified that he has grown tired of his duties as campaign treasurer (he appeared before grand juries both in 1995 and early 1997) and that he has indicated to both June Kim and Representative Kim since early 1997 that he would like to resign from the position.⁶⁹ According to Lee, his meeting with Representative Kim in the spring of 1997 expressed his desire to resign was the first and only time he had met Representative Kim during the more than two years as his campaign treasurer.⁷⁰ A replacement could not be found and Lee was asked to continue as treasurer while the search continues.⁷¹ The Kims’ insistence on giving campaign treasurers the authority to sign campaign checks without providing them with any real responsibility to ensure that such authority is properly exercised is extremely disturbing given the long history of election law violations and the imminence of the 1998 elections.

THE KIMS’ BOOK DEAL

Although questions of inappropriate remuneration from book deals generally raise questions of ethical violations rather than election law violations, circumstances surrounding the Kims' consecutive book deals with South Korean publishing houses raise troubling questions about whether foreign business or governmental interests are seeking to funnel money to support Representative Kim personally. These concerns are heightened by the testimony of Jane Chong, a former Kim campaign treasurer, that Representative Kim had planned a trip to Korea in 1993 during which he intended to raise substantial amounts of money.⁷² Chong testified that the trip was canceled only after a Los Angeles Times series reporting on Representative Kim's 1992 election law violations was published in July 1993.⁷³

The year after the cancellation of the South Korean fundraising trip, Representative Kim secured a lucrative contract for his book I'm Conservative.⁷⁴ The Congressman's book was written in Korean and published by a small, Seoul-based publishing company.⁷⁵ In August 1995, Representative Kim filed a financial disclosure form that revealed that he had been required to refund \$132,298 in book "proceeds" pursuant to a May 15 Ethics Committee decision.⁷⁶ Although the House ethics decision in question is not public, the House ethics manual specifies that for income to be valid "a book must be published by an established publisher pursuant to a usual and customary royalty agreement."⁷⁷ According to a Korean specialist at the Library of Congress, the amount of "proceeds" reported by Representative Kim would suggest that his book was extremely successful in South Korea, which has a relatively small book market by American standards.⁷⁸

Later in 1995, June Kim's own memoirs, There Is An Opportunity, were published in Korea by Hantutt Publishing Co., another small, Seoul-based company that is listed in a publishing directory as specializing in finance and technical books.⁷⁹ Representative Kim's financial disclosures reveal that his wife has earned between \$125,000 and \$1.05 million from this book deal. Seokuk Ma, however, stated in his deposition that he had heard only negative reactions to June Kim's book from inside Korea.⁸⁰ Since the ethics restrictions are less onerous with respect to books published by the spouse of a member, these circumstances raise troubling questions about whether this second, lucrative book, published by a relatively unknown Korean company, without apparent experience in marketing political memoirs is actually a second attempt to channel funds inappropriately to the Kims. Such actions may represent a criminal attempt to circumvent U.S. laws which prohibit foreign political contributions. Given the potential seriousness of the alleged wrongdoing, investigation of these issues by the House Ethics Committee, the Department of Justice and the Federal Elections Commission is also merited.

CONCLUSION

The Minority's investigation of Representative Kim was conducted by Minority staff and uncovered evidence of foreign contributions and systemic inadequacies in complying with federal election laws -- both of which are issues that were highly relevant to the Committee's investigation. It is revealing that the Committee confined its investigation of foreign money to allegations concerning the Democratic administration.

1. Washington Post, 2/7/98.
2. Washington Post, 2/7/98.
3. Plea and Sentencing Agreement, p. 5, United States v. Daewoo International (America) Corporation, No. CR 96-340, 3/26/96.
4. Plea and Sentencing Agreement, p. 5, United States v. Daewoo International (America) Corporation, No. CR 96-340, 3/26/96.
5. Plea and Sentencing Agreement, p. 5, United States v. Daewoo International (America) Corporation, No. CR 96-340, 3/26/96.
6. Plea and Sentencing Agreement, p. 5, United States v. Daewoo International (America) Corporation, No. CR 96-340, 3/26/96.
7. Plea and Sentencing Agreement, p. 5, United States v. Daewoo International (America) Corporation, No. CR 96-340, 3/26/96.
8. Associated Press, 8/1/97.
9. United States v. Daewoo International (America) Corporation, No. CR 96-340 (C.D. Ca.), Plea and Sentencing Agreement, p. 6, 4/12/96.
10. United States v. Jay C. Kim, et al., Plea Agreement, p. 8, 7/31/97.
11. Los Angeles Times, 7/14/93.
12. Los Angeles Times, 7/14/93.
13. Los Angeles Times, 7/14/93.
14. Los Angeles Times, 7/14/93.
15. Los Angeles Times, 7/14/93.
16. United States v. Jay C. Kim, et al., Plea Agreement, p. 9, 7/31/97.
17. United States v. Jay C. Kim, et al., Plea Agreement, p. 9, 7/31/97.
18. United States v. Jay C. Kim, et al., Plea Agreement, p. 11, 7/31/97.
19. United States v. Jay C. Kim, et al., Plea Agreement, p. 9, 7/31/97; Los Angeles Times, 8/19/97.

20. Los Angeles Times, 8/19/97.
21. Los Angeles Times, 8/19/97.
22. Washington Post, 2/7/98.
23. Los Angeles Time, 8/19/97.
24. United States v. Jay C. Kim, et al., Plea Agreement, p. 9, 7/31/97.
25. United States v. Jay C. Kim, et al., Plea Agreement, p. 10, 7/31/97.
26. United States v. Jay C. Kim, et al., Plea Agreement, p. 10, 7/31/97.
27. United States v. Jay C. Kim, et al., Plea Agreement, p. 10, 7/31/97.
28. United States v. Jay C. Kim, et al., Plea Agreement, p. 10, 7/31/97.
29. United States v. Jay C. Kim, et al., Plea Agreement, p. 10, 7/31/97.
30. Washington Post, 2/7/98.
31. Washington Post, 2/7/98.
32. Washington Post, 2/7/98.
33. Washington Post, 2/7/98.
34. United States v. Jay C. Kim, et al., Plea Agreement, p. 11, 7/31/97.
35. United States v. Jay C. Kim, et al., Plea Agreement, p. 11, 7/31/97.
36. Trial transcript (Direct of Seokuk Ma), pp. 8-11, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
37. Trial transcript (Direct of Seokuk Ma), pp. 8-11, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
38. Trial transcript (Direct of Seokuk Ma), pp. 12-16, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
39. Trial transcript (Direct of Seokuk Ma), pp. 17-20, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
40. Trial transcript (Direct of Seokuk Ma), pp. 23-24, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.

41. Trial transcript (Direct of Seokuk Ma), pp. 57-58, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
42. Trial transcript (Direct of Seokuk Ma), pp. 58, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
43. Trial transcript (Direct of Seokuk Ma), p. 59, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97; Los Angeles Times, 4/10/97.
44. Trial transcript (Direct of Seokuk Ma), p. 58, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97; Los Angeles Times, 4/10/97.
45. Trial transcript (Direct of Seokuk Ma), pp. 62-63, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
46. Seokuk Ma deposition, 9/19/97, p. 10: “June Kim called me, sign the check, blank check, campaign check, without any contents. I just sign it. She bring 20 sometimes or 40. I sign it.”
47. Trial transcript (Direct of Seokuk Ma), p. 58, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
48. Trial Transcript (Cross/Redirect of Seokuk Ma), p. 13, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
49. United States v. Jay C. Kim, et al., Plea Agreement, p. 9, 7/31/97; Seokuk Ma deposition, 9/19/97, p. 43: “That’s why I tell the truth; that’s why she got that guilty.”
50. Seokuk Ma deposition, 9/19/97, p. 43.
51. Trial transcript (Cross/Redirect of Seokuk Ma), p. 14, United States v. Seokuk Ma, No. CR 96-1141(B) -R, 4/11/97.
52. Seokuk Ma deposition, 9/19/97, p. 25-26.
53. Seokuk Ma deposition, 9/19/97, p. 13: “[T]he reason for June Kim change me, title as treasurer, because at that time I investigated by the FBI. He asking me questions. So I talk to June Kim, ‘Oh, yes, I talk with the FBI.’ and then since that time, she -- in her mind, she’s going to change me.”
54. Seokuk Ma deposition, 9/19/97, p. 30.
55. Seokuk Ma deposition, 9/19/97, p. 30.
56. Los Angeles Times, 2/7/98.
57. Los Angeles Times, 8/1/97.

58. Moon Lee deposition, 10/1/97, pp. 7-9.
59. Seokuk Ma deposition, 9/19/97, p. 13.
60. Moon Lee deposition, 10/1/97, p. 29.
61. Moon Lee deposition, 10/1/97, pp. 11-12.
62. Moon Lee deposition, 10/1/97, pp. 12-14 & 30.
63. Inyoung Brazil deposition, 10/1/97, pp. 8-15.
64. Inyoung Brazil deposition, 10/1/97, pp. 19-20.
65. Inyoung Brazil deposition, 10/1/97, p. 17.
66. Seokuk Ma deposition, 9/19/97, p. 19.
67. Seokuk Ma deposition, 9/19/97, p. 19.
68. Moon Lee deposition, 10/1/97, pp. 14-16.
69. Moon Lee deposition, 10/1/97, pp. 23-25.
70. Moon Lee deposition, 10/1/97, pp. 23-26.
71. Moon Lee deposition, 10/1/97, p. 25.
72. City News Service of Los Angeles, 4/10/97.
73. City News Service of Los Angeles, 4/10/97.
74. The Hill, 8/6/97.
75. The Hill, 8/6/97.
76. The Hill, 8/6/97.
77. The Hill, 8/6/97.
78. The Hill, 8/6/97.
79. The Hill, 8/6/97.
80. Seokuk Ma deposition, 9/19/97, p. 32.

